



DEPARTMENT OF THE ARMY  
ASSISTANT SECRETARY OF THE ARMY  
INSTALLATIONS, ENERGY AND ENVIRONMENT  
110 ARMY PENTAGON  
WASHINGTON DC 20310-0110  
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MEMORANDUM FOR

COMMANDER, ARMY MATERIEL COMMAND  
DIRECTOR, NATIONAL GUARD BUREAU  
CHIEF, U.S. ARMY RESERVE  
ASSISTANT CHIEF OF STAFF FOR INSTALLATION MANAGEMENT  
COMMANDER, INSTALLATION MANAGEMENT COMMAND

SUBJECT: Perfluorinated Compound (PFC) Contamination Assessment

1. References:

- a. Department of Defense Instruction (DoDI) 4715.18, Emerging Contaminants, 11 Jun 09
- b. Army Regulation 200-1, Environmental Protection and Enhancement, 13 Dec 07
- c. Department of Defense Manual 4715.20, Defense Environmental Restoration Program (DERP) Management, 9 Mar 12
- d. DoDI 4715.08, Remediation of Environmental Contamination Outside the United States, 1 Nov 13
- e. DoDI 4715.06 Environmental Compliance in the United States, 4 May 15

2. Background:

a. PFCs are a suite of Emerging Contaminants of concern based on the potential human health risks to sensitive populations. The Army has reviewed available data regarding potential exposures to PFCs and believes it is appropriate to take action where PFCs may have impacted on and off installation drinking water supplies.

b. Many products contain PFCs. Commonly used PFC-containing products in the Army are Aqueous Film Forming Foam (AFFF) used for firefighting, and chemical fume suppressants. The Environmental Protection Agency (EPA) recently issued a lifetime Health Advisory (HA) level of 0.07 micrograms per liter (µg/L) for perfluorooctanesulfonic acid (PFOS) and perfluorooctanoic acid (PFOA), and when both are found together, the HA level remains at 0.07 µg/L with both values added together. Some states and foreign countries hosting Army installations have similar or equivalent health based guidelines.

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3. This policy directs the following:

a. Water systems – The Army will sample for PFOS and PFOA in Army-owned or operated water systems located on Army installations that have not previously sampled for PFOS and PFOA. There is no limitation on the number of users served by the water system (e.g. single well systems) for sampling. This sampling is to be completed as soon as possible, but no later than the end of calendar year (CY) 2016. Notification will be provided to the Assistant Chief of Staff for Installation Management (ACSIM) if testing cannot be completed before the end of CY16. Additionally, Commands will assess if Army installations are receiving water from non-Army public water systems known to have exceeded the PFOS and PFOA HA levels. The Commands will report to ACSIM, as soon as possible, which non-Army PFC-impacted public water systems are supplying water to Army installations.

b. Water samples will be analyzed using an EPA approved method by an accredited laboratory. If concentrations of PFOS and PFOA above EPA HA levels (0.07 µg/L PFOS plus PFOA) or established health-based host nation values are identified and confirmed, users must be notified and interim actions such as supplying alternative drinking water or using different source water are authorized until the levels can be reduced below the HA. Installations shall not establish an alternate action level where a HA or other promulgated standard does not exist, or impose a more stringent level. Initial sampling will be funded using non-DERP accounts.

c. Proposed interim actions and risk communication activities described in 3b must be coordinated with and approved by the installation's land holding Army Command.

d. Army cleanup programs – The Army will research and identify locations where PFOS and PFOA are known or suspected to have been released on Army installations. The Army will assess and investigate releases and implement necessary response actions using the authority provided in References 1a-1e and other applicable DERP policies and guidance. Priority will be given to assessing known or suspected releases on Army installations where an Army-owned or operated water system has confirmed PFOS and PFOA levels above the HA, or where Army installations are within 20 miles of non-Army public water systems known to have exceeded the PFOS and PFOA HA levels. The Army will evaluate whether a release from these installations is contributing to the PFOS and PFOA levels in those water systems' source water.

e. ACSIM will provide implementing guidance to address necessary actions required by this policy.

4. My point of contact for this action is John Tesner, Director for Restoration, 703-697-1987, john.e.tesner.civ@mail.mil.



KATHERINE HAMMACK

CF:  
U.S. Army Medical Command (ATTN: Public Health Directorate)